UNITED STATES OF AMERICA	)	
	)	**STIPULATION OF**
v.	)	**EXPECTED TESTIMONY**
	)	
Manning, Bradley E.	)	**Ms. Florinda White**
PFC, U.S. Army,	)	
HHC, U.S. Army Garrison,	)	
Joint Base Myer-Henderson Hall	)	**10 June 2013**
Fort Myer, Virginia 22211	)	

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Ms. Florinda White were present to testify during the merits and pre-sentencing phases of this court-martial, she would testify substantially as follows:

1. I am the Configuration Management Lead for the Distributed Common Ground System Army (DCGS-A) program. I graduated with a degree in computer science in 1991. Thereafter, I completed additional courses in computer science. I have experience with Linux and Windows. Additionally, I have experience as a programmer, system administrator, network administrator, and system engineering. I specialize in computer management, which is a subspecialty of systems engineering. From 2005-2010, I worked as a contractor on the DCGS-A program for which I currently work. As a contractor, I worked as an analyst and in configuration management.

2. Currently, I work for Communications-Electronics, Research, Development and Engineering Center (CERDEC) Software Engineering Directorate (SED) at Aberdeen Proving Grounds, Maryland. CERDEC is the United States Army information and technologies and integrated systems center. SED provides software acquisition and software engineering support to Army tactical systems, to include creation of concept, concept development, demonstration of concept, production and development, and operations and maintenance, thereby developing and supporting software systems throughout their lifecycle. SED also provides information assurance and determines the requirements and necessary tools to complete tasks. Software products developed by SED supports Army war fighting efforts. DCGS-A is a component of SED.

3. DCGS-A is the Army's primary system to post data, process information, and disseminate intelligence, surveillance, and reconnaissance information about terrain, threats, weather, and other information relevant to Servicemembers. DCGS-A is the approved system used by intelligence analysts (35F Military Occupational Specialty). DCGS-A provides commanders the ability to receive intelligence from multiple sources and intelligence systems. Moreover, DCGS-A ensures each piece of approved hardware and software is secure, stable, and compatible with existing systems.

4. As the Configuration Management Lead, I ensure software and hardware for each system meets approved specifications and follows approved builds. The approved builds are also known as baselines. Each baseline consists of approved software and hardware. The software is specifically listed by program and version number. Hardware is specifically approved by type

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and manufacturer. A specific baseline is described in a Version Description Document (VDD). The VDD states each authorized component of a baseline. Any software or hardware not listed in the VDD is not authorized and is not part of the baseline.

5. The baseline is developed through a deliberate process. The Program Manager (PM) of each system approves each respective baseline that falls within the PM's system. The baseline is tested for stability. Stability means that the system itself is stable and that the system is stable when interacting with other approved systems. Stability is important because the computer system completes important tasks for Servicemembers and the system must work at all times, especially in a deployed environment. The baseline is also tested for security. Security means the system is secure by itself and when it interacts with other approved systems. Security is important because some of the computer systems contain classified information. The information is used by Servicemembers to complete their missions, and the systems maintain security so only authorized users can access the information. Ensuring stability and security requires extensive testing. Each new baseline is accredited, and any changes to the baseline must be certified after undergoing the vetting process.

6. Any change to the baseline requires new testing of the new baseline because a single change can affect a system's security or its stability. The process to make changes to the baseline begins when a user submits a request identifying requested capabilities. After a request has been submitted, the request goes before the Engineer Review Board (ERB). The ERB is comprised of subject matter experts, engineers, and testers. The ERB analyzes and assesses the requested changes for effectiveness and costs. The ERB also assesses any effect the requested change could have on the network. The ERB provides a recommendation based on its conclusions and testing to the Configuration Control Board (CCB). The CCB is comprised of configuration subject matter experts, engineers, and the relevant PM. The CCB then makes a final determination based on the effectiveness and cost. Changes to the baseline can be approved in 3 days up and to 1 year depending on the complexity of the system and the nature of the requested change. The process has been designed to maintain system security and stability.

7. After a baseline has been approved, a computer image is created. This computer image is installed onto approved systems. An image is used to ensure that each system receives exactly the same software. Using the same image ensures that the DCGS-A program only tests one image instead of testing each system. This increases the likelihood the software will comport with the approved baseline.

8. **Prosecution Exhibit (PE) 9** is the VDD. **PE 9** describes the baseline for a Basic Analyst Laptop (BAL). I am familiar with the VDD in **PE 9** and other VDDs because I work with them daily in my position as the Configuration Management Lead. As the Configuration Management Lead, I inspect images to ensure the image meets the standards set forth in the baseline. I check each program individually to ensure it is the correct program and specifically the correct version of the program. Any software not approved in the baseline, as reflected in the VDD, is not authorized. Specifically, even if a software program is authorized, the program cannot be added to the image unless it is an approved version from approved source. That is, the approved version of the program must be obtained from an authorized source. Programs obtained from

unauthorized sources, such as the Internet, could obtain viruses, Trojan horses, or other malware that would jeopardize both system security and stability.

9. Wget is a computer program that retrieves content from web servers, and is part of the GNU Project. Wget supports downloading via HTTP, HTTPS, and FTP protocols, which are common protocols used on the internet for webpages. Wget is a free network utility commonly used to retrieve files from the internet. It has been designed for robustness over slow or unstable network connections. If a download does not complete due to a network problem, Wget will automatically try to continue the download from where it left off, and repeat this until the whole file has been retrieved. Wget is non-interactive in the sense that once started, it does not require user interaction. To my knowledge, Wget has never been authorized as part of any DCGS-A baseline, nor has it been requested for approved use. As such, Wget has never been reviewed by our program and I cannot say whether it would be approved for use or not. The VDDs created for V3.0P17, V3.0P18, V3.1P3 each did not authorize Wget on a DCGS-A computer or for it to be used by a DCGS-A user.

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